

combined, conspired, confederated, and agreed together and with each other to murder an individual ("Victim-4"), to wit, DEBELLO, ELLIS, DELLIGATTI, and others known and unknown, agreed to murder Victim-4, in violation of New York State Penal Law, Sections 105.15 and 125.25.

(Title 18, United States Code, Section 1959(a)(5).)

COUNT THREE

(Attempted Murder in Aid of Racketeering)

The Grand Jury further charges:

21. Paragraphs 1 through 11 and 18 through 19 of this Indictment are repeated and incorporated by reference as though fully set forth herein.

22. From at least in or about May 2014, up to and including in or about June 2014, in the Southern District of New York and elsewhere, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," and SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," the defendants, and others known and unknown, as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value from the Genovese Organized Crime Family, and for the purpose of gaining entrance to and maintaining and increasing position in the Genovese Organized Crime Family, an enterprise engaged in racketeering activity, as described above, knowingly attempted to

murder Victim-4, to wit, DEBELLO, ELLIS, DELLIGATTI, and others known and unknown, attempted to murder Victim-4, in violation of New York State Penal Law, Sections 20.00, 110.00, and 125.25.

(Title 18, United States Code, Section 1959(a)(5).)

COUNT FOUR

(Conspiracy to Commit Murder for Hire)

The Grand Jury further charges:

23. From at least in or about May 2014, up to and including in or about June 2014, in the Southern District of New York and elsewhere, SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," LUIGI ROMANO, a/k/a "Louie Sunoco," and BERTRAM DUKE, a/k/a "Birdy," the defendants, and others known and unknown, knowingly did combine, conspire, confederate, and agree together and with each other to travel in and cause another to travel in interstate commerce, and to use and cause another to use the mail and a facility of interstate commerce, with intent that a murder be committed in violation of the laws of a State and of the United States as consideration for the receipt of, and as consideration for a promise and agreement to pay, a thing of pecuniary value, to wit, DELLIGATTI, ROMANO, DUKE, and others, known and unknown, agreed to murder Victim-4 in exchange for money, which arrangements depended in part upon communications by cellular telephones operating on interstate networks.

(Title 18, United States Code, Section 1958.)

COUNT FIVE

(Illegal Gambling)

The Grand Jury further charges:

24. From at least in or about 2013, up to and including in or about May 2016, in the Southern District of New York and elsewhere, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," STEVEN PASTORE, RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," LUIGI CAMINITI, SCOTT JACOBSON, FRANK CELSO, MICK SOKOL, SPYRO ANTONAKOPOULOS, MICHAEL KARNBACH, a/k/a "Combat," and JONATHAN DESIMONE, the defendants, and others known and unknown, unlawfully, willfully, and knowingly conducted, financed, managed, supervised, directed, and owned all and part of an illegal gambling business, namely a large-scale bookmaking and sports betting operation, in violation of New York Penal Law Section 225.10, and which business involved five and more persons who conducted, financed, managed, supervised, directed, and owned all and part of it, and which business had been and remained in substantially continuous operation for a period in excess of thirty days and had gross revenues of \$2,000 in a single day.

(Title 18, United States Code, Sections 1955 and 2.)

COUNT SIX

(Use of Firearms for Crimes of Violence)

The Grand Jury further charges:

25. From at least in or about 2008, up to and including in or about May 2016, in the Southern District of New York and elsewhere, ROBERT DEBELLO, a/k/a "Old Man," a/k/a "Bobby," a/k/a "Grandpa," and RYAN ELLIS, a/k/a "Joseph Princi," a/k/a "Baldy," a/k/a "Lazy Eye," a/k/a "Zeus," the defendants, and others known and unknown, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in Count One of this Indictment, the conspiracy to commit murder in aid of racketeering charged in Count Two of this Indictment, and the attempted murder in aid of racketeering charged in Count Three of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT SEVEN

(Use of Firearms for Crimes of Violence)

The Grand Jury further charges:

26. From at least in or about 2008, up to and including in or about June 2014, in the Southern District of New York and elsewhere, SALVATORE DELLIGATTI, a/k/a "Jay," a/k/a "Fat Sal," the

defendant, and others known and unknown, during and in relation to crimes of violence for which they may be prosecuted in a court of the United States, namely, the racketeering conspiracy charged in Count One of this Indictment, the conspiracy to commit murder in aid of racketeering charged in Count Two of this Indictment, the attempted murder in aid of racketeering charged in Count Three of this Indictment, and the murder-for-hire conspiracy charged in Count Four of this Indictment, knowingly did use and carry firearms, and, in furtherance of such crimes of violence, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

COUNT EIGHT

(Use of a Firearm for Murder-for-Hire Conspiracy)

The Grand Jury further charges:

27. In or about June 2014, in the Southern District of New York and elsewhere, LUIGI ROMANO, a/k/a "Louie Sunoco," and BERTRAM DUKE, a/k/a "Birdy," the defendants, and others known and unknown, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, the murder-for-hire conspiracy charged in Count Four of this Indictment, knowingly did use and carry a firearm, and, in